

THE GRAND JURY CHARGES:

INTRODUCTION

1. At various times material to this indictment, the Defendants:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

ROY FORD (7)

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

and others known and unknown to the Grand Jury, were members of a drug distribution conspiracy to distribute 500 grams or more of methamphetamine; 40 grams or more of fentanyl; cocaine and other illegal narcotics. The drug distribution network of this conspiracy reached from the United States/Mexico border to numerous distributors in Austin, Texas.

2. Telephones were utilized extensively by members of the conspiracy in order for co-conspirators to coordinate drug deals. Co-conspirators would learn when drugs were available, the quantity and quality of the drugs available, the price to be charged, and the location where the deal could be conducted.

Objective of the Conspiracy

3. The objective of the conspiracy was to make money for the co-conspirators from the sale of controlled substances without being caught by law enforcement. In order to ensure that conspirators maximized their chances of avoiding detection by law enforcement, a number of protective measures were utilized in order to defeat tactics which law enforcement might utilize to

uncover and curtail their illegal activities. These protective measures included the use of coded language over the telephone; the use of cell phones that could be easily discarded and/or placed under false names and addresses; and the use of multiple vehicles. In addition to protective measures regarding phones, co-conspirators exercised protective measures while driving to and from drug related meetings. These measures included being very vigilant for any law enforcement surveillance. Co-conspirators would look at surrounding vehicles to determine if they might be unmarked police vehicles monitoring their movements.

Coded Language

4. Coded language was commonly utilized during drug-related phone calls in an effort to make the drug-related nature of the phone calls less obvious. Suppliers and customers would use abbreviated numbers to indicate the quantity and price for controlled substances.

5. The type of drug ordered would also be indicated by separate code words. Methamphetamine would often be referred to as "paint," "taco's," "new car" (kilogram), "ice," and "girls," among other terms. Heroin would often be referred to as "the black one," "mud," "tar," "negro" (black tar), and "brown," among other terms. Pills would often be referred to as "oxys," "percosets," "percs," and "pills, among other terms." Cocaine would often be referred to as "snow" or "powder," among other terms.

6. Amounts of drugs would be indicated by words such as "3" (3 ounces), "3 pack" (3 ounces), "8 ball" (3-3.5 ounces), "ball" (3-3.5 ounces), "zip" (1 ounce), and "onion" (1 ounce), among other terms. Cash or currency was referred to as "paper," among other terms.

Cell Phones

7. The use of cell phones made it easier for coconspirators to defeat tactics utilized by law enforcement to uncover their activities. Co-conspirators used cell phones registered to other

persons. Suppliers would frequently change their cell phones which made it more difficult for law enforcement to keep up with each conspirator's currently utilized telephone number. When co-conspirators suspected that their previously used cell phone telephone number might have been compromised, such as when one of their customers was arrested, they could easily quit using or "drop" a cell phone and quickly obtain a new cell phone.

COUNT ONE

**Conspiracy to Distribute 500 Grams or more of Methamphetamine, 40 Grams or more of Fentanyl, and Cocaine
[21 U.S.C. § 846 {841(a)(1)&(b)(1)(A, B, & C)}]**

8. Paragraphs 1 through 7 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.
9. Beginning in or around March 2019 and continuing until on or about the date of this Indictment, in the Western District of Texas, the Defendants,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

ROY FORD (7)

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

did knowingly, unlawfully and willfully combine, conspire, confederate and agree with each other and others both known and unknown to the Grand Jury to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, to distribute 40 grams of more of a mixture and substance containing fentanyl, and to distribute a mixture and substance containing a detectable amount of cocaine, all controlled substances in violation of Title 21, United

OVERT ACTS

10. In furtherance of the conspiracy and in order to effect the objects thereof, the Defendants and their co-conspirators, known and unknown to the Grand Jury, committed and caused to be committed one or more of the following overt acts, among others, in the Western District of Texas and elsewhere:

OA 1: On or about March 1, 2019, [REDACTED] possessed approximately 2 kilograms of methamphetamine supplied by [REDACTED].

OA 2: On or about March 14, 2019, [REDACTED] referred a confidential informant (CI) to contact [REDACTED] to obtain methamphetamine and other controlled substances.

OA 3: On or about March 20, 2019, [REDACTED] supplied an undercover officer (UC) with approximately 90 grams of methamphetamine.

OA 4: On or about March 27, 2019, [REDACTED] and [REDACTED] supplied a UC with approximately 91 grams of methamphetamine.

OA 5: On or about April 12, 2019, [REDACTED] supplied a UC with approximately 121 grams of methamphetamine.

OA 6: On or about April 17, 2019, [REDACTED] supplied a UC with approximately 260 grams of methamphetamine. During the meeting, [REDACTED] directed the UC to place \$50 on [REDACTED] prison commissary account as a drug tax for the transaction.

OA 7: On or about May 8, 2019, [REDACTED] supplied a UC with approximately 261 grams of methamphetamine.

OA 8: On or about May 14, 2019, [REDACTED] possessed with the intent to distribute approximately 86.6 grams of methamphetamine in Travis County, Texas. Law enforcement agents conducted a traffic stop of [REDACTED] and arrested her after locating and seizing the drugs.

OA 9: On or about May 20, 2019, [REDACTED] and ROY FORD possessed with the intent to distribute approximately 2 kilograms of methamphetamine in Burnet County, Texas. Law enforcement agents conducted a traffic stop of [REDACTED] and FORD and arrested them after locating and seizing the drugs, \$11,865 in cash, and a handgun.

OA 10: On or about June 5, 2019, [REDACTED] supplied a UC with approximately 267.31 grams of methamphetamine.

OA 11: On or about July 11-28, 2019, [REDACTED] and [REDACTED] discussed, in a series of recorded jail calls, [REDACTED] collection of drug debts and methamphetamine. Law enforcement agents obtained a copy of the recorded jail calls.

OA 12: On or about July 18-20, 2019, [REDACTED] and [REDACTED] discussed, in a series of recorded jail calls, [REDACTED] distribution of methamphetamine. Law enforcement agents obtained a copy of the recorded jail calls.

OA 13: On or about July 26-August 2, 2019, [REDACTED] and individuals unknown to the Grand Jury discussed, via phone calls, distributing methamphetamine and heroin. Law enforcement agents intercepted and recorded the phone calls.

OA 14: On or about August 5-18, 2019, [REDACTED], via a phone call, demanded that [REDACTED] pay a drug debt. Law enforcement agents intercepted and recorded the phone call.

OA 15: On or about August 5, 2019, [REDACTED] via phone calls, requested

assistance sending money to Mexico from individuals unknown to the Grand Jury. Law enforcement agents intercepted and recorded the phone calls.

OA 16: On or about August 19, 2019, [REDACTED] supplied a UC with approximately 261 grams of methamphetamine.

OA 17: On or about August 28, 2019, [REDACTED] arranged for a UC to purchase approximately 997 grams of meth from an unidentified supplier in San Antonio, Texas.

OA 18: On or about September 6, 2019, [REDACTED] and [REDACTED] discussed, via phone calls, the distribution of pills containing fentanyl and making partial payment to the supplier of said pills. Law enforcement agents intercepted and recorded the phone calls.

OA 19: On or about September 7, 2019, [REDACTED] and [REDACTED] discussed, via a phone call, the distribution of pills containing fentanyl. Law enforcement agents intercepted and recorded the phone call.

OA 20: On or about September 7, 2019, [REDACTED] arranged to have [REDACTED] send \$1,000 to Mexico in partial payment for receipt of 1000 pills containing fentanyl.

OA 21: On or about September 9, 2019, [REDACTED] sent a text message to [REDACTED] confirming [REDACTED] sent \$1,000 to Mexico on behalf of [REDACTED]. Law enforcement agents intercepted and recorded the text message.

OA 22: On or about September 11-14, 2019, [REDACTED] and [REDACTED] discussed, via a series of phone calls, the distribution of pills containing fentanyl and making partial payment to the supplier of said pills. Law enforcement agents intercepted and recorded the phone calls.

OA 23: On or about September 11, 2019, [REDACTED] and [REDACTED] discussed, via a series of phone calls, the distribution of pills, later determined to contain fentanyl, and specifically discussed a later sale of pills to the UC. Law enforcement agents intercepted and recorded the phone calls.

OA 24: On or about September 12, 2019, [REDACTED] and [REDACTED] supplied a UC with approximately 150 pills containing fentanyl.

OA 25: On or about September 12, 2019, [REDACTED] and [REDACTED] supplied a UC with approximately 86.6 grams of methamphetamine.

OA 26: On or about September 13, 2019, [REDACTED] and [REDACTED] discussed, via a phone call, drug distribution. Law enforcement agents intercepted and recorded the phone call.

OA 27: On or about September 19-21, 2019, [REDACTED] and [REDACTED] discussed, via a series of phone calls, the distribution of pills containing fentanyl and making partial payment to the supplier of said pills. Law enforcement agents intercepted and recorded the phone calls.

OA 28: On or about September 21, 2019, [REDACTED] and [REDACTED] discussed, via a series of phone calls, sending \$1,000 to Mexico for the pills containing fentanyl and discussed distribution of said pills. Law enforcement agents intercepted and recorded the phone calls.

OA 29: On or about September 21, 2019, [REDACTED] sent a text message to [REDACTED] confirming [REDACTED] sent \$1,000 to Mexico on behalf of [REDACTED]. Law enforcement agents intercepted and recorded the text message.

OA 30: On or about September 24, 2019, [REDACTED] [REDACTED]

and [REDACTED] arranged to distribute and distributed approximately 700 pills containing fentanyl through the mail.

OA 31: On or about September 24-25, 2019, [REDACTED] and [REDACTED] discussed, via a series of phone call and text messages, the distribution of pills containing fentanyl via the mail. Law enforcement agents intercepted and recorded the phone calls and text messages.

OA 32: On or about September 24-August 12, 2019, [REDACTED] and ROY FORD discussed, via a series of phone calls, distribution of drugs. Law enforcement agents intercepted and recorded the phone calls.

OA 33: On or about September 27, 2019, [REDACTED] and [REDACTED] discussed, via a phone call, the distribution of the remaining pills containing fentanyl. Law enforcement agents intercepted and recorded the phone call.

OA 34: On or about August 1, 2019, [REDACTED] and ROY FORD discussed, via a phone call, FORD's drug debt owed to [REDACTED]. Law enforcement agents intercepted and recorded the phone call.

OA 35: On or about August 14, 2019, [REDACTED] and ROY FORD discussed, via a phone call, [REDACTED] picking up money from FORD and possibly dropping off drugs at FORD's apartment. Law enforcement agents intercepted and recorded the phone call.

OA 36: On or about October 3, 2019, [REDACTED] and [REDACTED] discussed, via a series of phone calls, distribution of a controlled substance to an unknown buyer in Austin, Texas. Law enforcement agents intercepted and recorded the phone calls.

OA 37: On or about October 3, 2019, [REDACTED] possessed with the intent to distribute approximately 44.4 grams of cocaine in Bastrop County, Texas. Law enforcement

agents conducted a traffic stop of [REDACTED] and arrested him after locating and seizing the drugs.

11. All in violation of 21 U.S.C., Sections 846 {841(a)(1), and 841(b)(1)(A)&(C)}.

QUANTITY OF CONTROLLED SUBSTANCE INVOLVED IN THE CONSPIRACY

12. The quantity of the mixtures or substances containing methamphetamine, fentanyl, and cocaine involved in the conspiracy and attributable to each Defendant as a result of each Defendant's own conduct and as a result of the conduct of other conspirators reasonably foreseeable to each Defendant is as follows:

DEFENDANT	QUANTITY	STATUTE
[REDACTED]	86.6 g methamphetamine	21 U.S.C. §841(b)(1)(A)
[REDACTED]	1000 pills fentanyl 44.4 g cocaine	21 U.S.C. §841(b)(1)(B & C)
[REDACTED]	1000 pills fentanyl	21 U.S.C. §841(b)(1)(B)
[REDACTED]	1000 pills fentanyl	21 U.S.C. §841(b)(1)(B)
[REDACTED]	4463.3 g methamphetamine	21 U.S.C. §841(b)(1)(A)
[REDACTED]	44.4 g cocaine 1000 pills fentanyl	21 U.S.C. §841(b)(1)(B & C)
ROY FORD (7)	2000 g methamphetamine	21 U.S.C. §841(b)(1)(A)
[REDACTED]	3835 g methamphetamine 150 pills fentanyl	21 U.S.C. §841(b)(1)(A & B)
[REDACTED]	358.31 g methamphetamine	21 U.S.C. §841(b)(1)(A)
[REDACTED]	4167 g methamphetamine	21 U.S.C. §841(b)(1)(A)
[REDACTED]	86.6 g methamphetamine	21 U.S.C. §841(b)(1)(A)


13 All in violation of Title 21, United States Code, Sections 846 {841(a)(1), and 841(b)(1)(A)&(C)}.

A TRUE BILL:

ORIGINAL SIGNATURE
REDACTED PURSUANT TO
E-GOVERNMENT ACT OF 2002

JOHN F. BASH.
United States Attorney

By:



KEITH M. HENNEKE
Assistant United States Attorney